

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c) KARINA PIA LUCID, ESQ., LLC 3640 Valley Road, Suite 2-A PO Box 230 Liberty Corner, New Jersey 07938-0230 Tel: (908) 350-7505 Email: klucid@karinalucidlaw.com Karina Pia Lucid, Esq. <i>Counsel for the debtor, David Sadek</i>	
In Re:	Case No.: 11-36743 (JKS)
DAVID SADEK	Chapter 7
Debtor(s).	

**NOTICE OF MOTION TO REOPEN PROCEEDINGS, IMPOSE AUTOMATIC STAY
AND AVOID CERTAIN LIENS**

PLEASE TAKE NOTICE that on as soon thereafter as counsel may be heard, Karina Pia Lucid, Esq. LLC, attorney for David Sadek (the “Debtor”) in the above-referenced bankruptcy case shall move before the Honorable John K. Sherwood, at the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, New Jersey 07102, for the entry of an Order Reopening the Debtor’s Chapter 7 Case and Avoiding Certain Judicial Liens, and for such other and further relief as is just.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the motion (the “Motion”) submitted herewith. A brief in Support of this Motion is filed contemptuously herewith. Oral argument is not requested. A proposed form of order is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that any objection to the Motion must be filed and served no later than 7 days prior to the Hearing Date pursuant to the applicable Local Rules

of Bankruptcy Procedure. In the event that no objections are filed, the relief requested in this Motion may be granted.

KARINA PIA LUCID, ESQ., LLC
Counsel for the debtor, David Sadek

/s/ Karina Pia Lucid

Dated: April 25, 2019

Karina Pia Lucid